

MATTHEW FARR, )  
)  
Plaintiff, )  
)  
v. )  
)  
THE UNITED STATES OF )  
AMERICA, )  
)  
Defendant. )

Defendant, United States of America, by and through the Acting United States Attorney for the Eastern District of North Carolina, in answer to the allegations contained in the Complaint avers and states as follows to the enumerated paragraphs:

1. Defendant United States (“Defendant”) admits Plaintiff purports to bring a cause of action under 18 U.S.C. § 925(A)(2) to seek an order compelling the Federal Bureau of Investigation (“FBI”) to approve a firearm transfer to Plaintiff. Except as expressly admitted, Defendant denies the allegations in Paragraph 1.

**Defendant's response to Plaintiff's Parties paragraph.**

2. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's characterization of his residency and domicile and to the extent a response is required, Defendant denies.

**Defendant's response to Plaintiff's Jurisdiction and Venue paragraphs.  
(Paragraphs 3-5)**

3. Defendant admits the Court has jurisdiction under 28 U.S.C. § 1331 to adjudicate an action arising under 18 U.S.C. § 925A. Except as expressly admitted, Defendant denies the allegations in Paragraph 3.

4. Defendant denies.

5. Defendant admits.

**Defendant's response to Plaintiff's Statement of Facts.  
(Paragraphs 6-18)**

6. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

7. Defendant denies.

8. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

9. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

10. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

11. Defendant admits.

12. Defendant admits.

13. Paragraph 13 expresses Plaintiff's intent to possess firearms and his purported "fear of arrest and prosecution" for which no response is required. To the extent a response is required, Defendant denies.

14. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

15. Defendant admits.

16. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

17. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

18. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

**Defendant's response to Plaintiff's First Claim – 18 U.S.C. § 925A**

19. Paragraph 19 incorporates by reference Plaintiff's previous paragraphs. Defendant hereby incorporates by reference Defendant's responses 1-18 to Plaintiff's previous paragraphs.

20. Defendant admits.

21. Defendant denies.

22. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the Plaintiff's allegation and to the extent a response is required, Defendant denies.

**Defendant's response to Plaintiff's Prayer for Relief.**

By way of further answer, Defendant denies that Plaintiff is entitled to any of the relief sought in his "Prayer for Relief" clause, including sub-parts A-E.

WHEREFORE, Defendant, having fully answered, prays that the Court dismiss this action with prejudice, that judgment be entered in favor of the Defendant, the Plaintiff receive no relief, that all costs and expenses of this litigation be borne by the Plaintiff, that the Defendant be awarded costs incurred in defense of this action as may be permitted by law, and that this Court grant such other and further relief as it deems appropriate and necessary.

Respectfully submitted this 16th day of June 2021.

G. NORMAN ACKER, III  
Acting United States Attorney

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## CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that on this 16th day of June 2021 Defendant served a copy of the foregoing Answer upon the below-listed party electronically filing the foregoing with the Court on this date using the CM/ECF system or placing a copy in the U.S. Mail to the following:

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